

IN THE COMMON PLEAS COURT OF PREBLE COUNTY, OHIO
CIVIL DIVISION

TIMOTHY W. JENKINS,
ERIE INSURANCE - 3rd PARTY
Plaintiff(s),

v.

LAMAR SAMUELS,
PURDY BROTHERS
TRUCKING, LLC,
P & S TRANSPORTATION,
P & S RISK RETENTION
GROUP, INC.
Defendant(s).

CASE NO.: 21CV032297

COMPLAINT FOR DAMAGES

JURY DEMAND

FILED
CLERK OF COURTS
PREBLE COUNTY, OHIO
JUL 21 AM 11:32
BRUCE C. HORNOLDS

COMPLAINT

This is a claim for damages brought by the Plaintiff, Timothy W. Jenkins, pro se, against the Defendant, Lamar Samuels, et al., and for cause would show unto the Court as follows, to wit:

1. The Plaintiff is an adult resident citizen of Wayne County, Indiana, whose address is 821 NW 'B' Street, Richmond Indiana 47374.

2. The Defendant is an adult resident citizen of Worcester County, Massachusetts, whose address is 11 Bleeker Street, Worcester, Massachusetts 01604.

Exhibit

A

3. At the times herein mentioned, Defendant, Purdy Brothers Trucking, LLC, was the owner of a commercial 2016 Freightliner semi-trailer truck which is the vehicle operated by Lamar Samuels in the incident complained of.

4. On the 22nd day of July, 2019, Lamar Samuels was the agent, servant and employee of said Defendant and was operating the above-mentioned vehicle within the scope of his employment as an employee of Purdy Brother Trucking, LLC.

5. On the date mentioned above, Plaintiff was operating his automobile in a safe and prudent manner and was traveling west-bound on US Highway 70 in Jefferson Township, Preble County, Ohio, one-half mile from the Indiana-Ohio State Line.

6. At the time herein complained of, the vehicle was operated and maintained by the Defendant, and due to the careless, reckless and negligent actions of the Defendants, caused property damage and personal injury to the Plaintiff, all of which occurred without fault or negligence on the part of the Plaintiff.

7. As a proximate cause of the negligence of the Defendants, Plaintiff was caused, and will be caused in the future, to suffer the following injuries and damages:

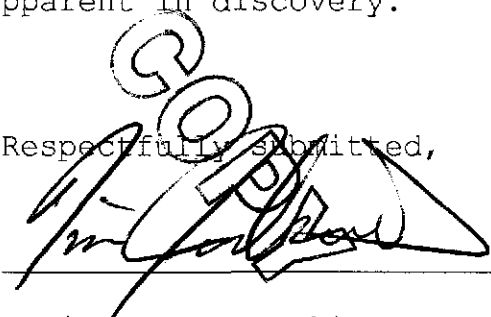
- a. Medical, doctor, hospital and drug bills both in the past and reasonably anticipated in the future.

- b. Loss of wage earnings and loss of wage earnings reasonably anticipated in the future.
- c. Loss of wage earnings capacity.
- d. Physical pain and suffering both in the past and the reasonably anticipated physical pain and suffering in the future.
- e. Deprivation of his ability to enjoy a normal life.
- f. Mental anguish and suffering in the past and mental anguish, suffering and permanent damage in the future stemming from the injuries to the nervous system.

WHEREFORE, Plaintiff demands judgment of and from the Defendants, LAMAR SAMUELS, et al., a sum in excess of \$25,000.00 for damages that include items 7a through 7f above, all court costs, attorney fees, filing fees, compound interest and any other issues that may become apparent in discovery.

Respectfully submitted,

Dated: 7/21/21


Name: Timothy W. Jenkins
Address: 821 NW 'B' Street
City, State, Zip: Richmond, IN 47374
Phone: (765)960-7803
E-Mail: timjenkins2772@yahoo.com

INSTRUCTIONS TO THE CLERK

Please mail a certified copy of the above and foregoing by
Certified Mail/Personal Service/Ordinary U.S. Mail to each of
the following:

DEFENDANT #1
Mr. Lamar Samuels
11 Bleeker St.
Worcester, MA 01604

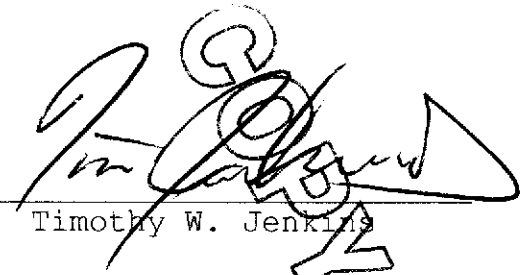
DEFENDANT #2
P & S Transportation
Attn: Richie Malone
PO Box 2487
Birmingham, AL 35201

DEFENDANT #3
Purdy Brothers Trucking
201 19th Street
Birmingham, AL 35218

DEFENDANT #4
P & S RISK RETENTION GROUP, INC.
Attn: Cliff Hance
One Poston Road, Suite 155
Charleston, SC 29407

3RD PARTY PLAINTIFF #1
Erie Insurance
Attn: Janet Bucher
4690 Munson Street NW
Canton, OH 44718

THIS the 21st day of July, 2021.



Timothy W. Jenkins